TO: COMMISSIONERS OF THE FEDERAL COMMUNICATIONS COMMISSION

FROM: WILLIAM J SALUK, VICE PRESIDENT AND GENERAL MANAGER KSOM-FM, KSWI-FM

SUBJECT: COMMENTS TO PROPOSED RULEMAKING – FCC DOC 04-233

DATE: 2/4/2008

I submit the following comments in response to the Localism Notice of Proposed Rulemaking (the "NPRM"), released Jan. 24, 2008, in MB Docket No. 04-233.

Many of the proposals in NPRM, contrary to the FCC's stated objectives, would harm both localism and diversity of viewpoints.

The true beacons of localism and diversity are smaller market radio stations and stations that offer specialized programming. These types of stations also serve as important gateways for new entrants seeking business opportunities in broadcasting – increasing ownership among those groups traditionally underrepresented.

But just as major operating costs are quickly rising, and more Americans are turning to new media, the NPRM proposes measures that would substantially raise costs – something that will be keenly felt among small market broadcasters. The rational economic response will be service cutbacks or outright shutdowns. Neither outcome is in the public interest.

One of these proposals would force radio stations to curtail reliance on labor-saving technology. An end to un-staffed operations will not improve responsiveness to a local community. To the contrary, it will result in stations broadcasting fewer hours or ceasing broadcast altogether. Unattended operation with proper safeguards has helped small stations provide more service through efficiency. Our stations, for example, utilize technology that enables our staff to conduct a live broadcast anywhere with a simple cellular phone. Within seconds our staff can report breaking news, weather emergencies and other items in the community interest. Current technology allows the radio station studio to be anywhere it needs to be, and thereby more local. A change to force broadcasters to be fully staffed around the clock will create a strong disincentive to remain on the air during times where revenue is minimal or non-existent such as evenings or overnights. I do feel that the increased operating costs will push potential new entrepreneurs, including women and minorities to sidestep broadcasting and find other industries to invest their savings and sweat equity.

The Commission must also reject the proposal that would further limit where broadcasters can locate their main studios. The Commission acted in the public interest when it adopted rules many years ago to permit stations greater flexibility in selecting the location of their main studios, particularly in situations in which a broadcaster operates stations licensed to several nearby communities. We would suffer great financial hardships if we were to have to split our operation into two different buildings in two different communities. The monies we would spend on enhancing our programming and services offered to the communities we serve would be spent on the additional and unneeded real estate costs.

Operators in smaller markets, such as myself, understand that localism and attention to the communities we serve is how we survive financially. This balance is delicate, and the Commission must not take action that will tip the balance so stations cut back on service or drop out. There is no 'public interest' in service that is both diminished and less diverse.

Respectfully submitted,

William J Saluk
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